

Exhibit 1
Proposed Order

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN**

In re

CITY OF DETROIT, MICHIGAN,

Debtor.

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) Chapter 9

)

) Case No. 13-53846

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) Hon. Steven W. Rhodes

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**ORDER GRANTING THE OBJECTORS' MOTION *IN LIMINE* TO
PRECLUDE DEBTOR FROM OFFERING EVIDENCE REGARDING THE
LIKELIHOOD OF SUCCESS, COMPLEXITY, AND EXPENSE OF
CLAIMS THE CITY SEEKS TO SETTLE WITH THE FORBEARANCE
AND OPTIONAL TERMINATION AGREEMENT**

This matter having come before the Court on the motion of the Objectors for the entry of an order precluding the City of Detroit from offering evidence regarding the likelihood of success, complexity, and expense of claims it seeks to settle with the Forbearance and Optional Termination Agreement, the Court having reviewed the Objectors' motion; and the Court having determined that the legal and factual bases set forth in the motion establish just cause for the relief granted herein;

IT IS HEREBY ORDERED THAT:

1. The Objectors' Motion *in Limine* to Preclude Debtor from Offering Evidence Regarding the Likelihood of Success, Complexity, and Expense of Claims the City Seeks to Settle with the Forbearance and Optional Termination Agreement is GRANTED.

2. The Debtor, the City of Detroit, is precluded from introducing evidence regarding the likelihood of success, complexity, and expense of the claims the Debtor seeks to settle with the Forbearance and Optional Termination Agreement at the hearing on the Motion of Debtor for Entry of an Order (I) Authorizing the Assumption of that Certain Forbearance and Optional

Termination Agreement Pursuant to Section 365(a) of the Bankruptcy Code, (II) Approving Such Agreement Pursuant to Rule 9019, and (III) Granting Related Relief.

3. The joining Objectors are authorized to take all actions necessary to effectuate the relief granted pursuant to this Order in accordance with the motion.

4. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

5. The Court retains jurisdiction with respect to all matters arising from or related to the implementation of this Order.

IT IS SO ORDERED.

STEVEN W. RHODES
United States Bankruptcy Judge